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UNITED STATES DISTRICT COURT

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SOUTHERN DISTRICT OF OHIO

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WESTERN DIVISION

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ERIC L. JEFFRIES, :

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Plaintiff, :

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: Case No. C-1-02-351)

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CENTRE LIFE INSURANCE :
COMPANY, et al., :

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Defendants. :
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Deposition of ERIC L. JEFFRIES,

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Plaintiff herein, called by the Defendants for

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Cross-examination, pursuant to the Federal Rules of

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Civil Procedure, taken before me, Angie Portune, a

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Registered Merit Reporter and Notary Public in and

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for the State of Ohio, at the offices of Wood &

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Lamping, 600 Vine Street, 2500 Convergys Building,

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Cincinnati, Ohio, on Wednesday, September 10, 2003,

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at 9:47 AM.

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1 A. I remember this because there was a
2 professor at a medical school in Texas. I want to
3 say Baylor Medical School. And this lady was a,
4 there was a thing on 60 Minutes or 20/20 or
5 something like that. And this doctor research -- it
6 was a research kind of doctor, was on that show.
7 And it was about people that were having adverse
8 reactions to that hepatitis B vaccine. And through
9 that doctor there was some research they were doing
10 at the University of Oklahoma, and so.

11 Q. Did you go down to Baylor to see this
12 female doctor down there?

13 A. I did not.

14 Q. You simply talked with her on the phone?

15 A. Yeah.

16 Q. And in your phone conversation with the
17 female doctor at Baylor you came to learn of some
18 research project being done in Oklahoma?

19 A. I -- this goes back, but I'm pretty
20 confident that's how that happened.

21 Q. Okay.

22 A. I don't, I don't remember the specifics
23 about it, but they wanted to -- they were trying to
24 look at a common, trying to find some common immune

1 MR. ROBERTS: Objection.

2 A. I, I, I -- well, I don't know for certain.
3 I think it was the doctor from Baylor. I don't
4 know. I don't remember. I think that's what it was
5 but I'm not sure. You know, it might have been that
6 doctor that was in Houston, was on that 60 Minutes
7 program or 20/20 or whatever it was. Maybe that's
8 what it was. I think that, I think that might be.

9 Q. Did you contact all of the players that
10 appeared on the 60 Minutes program?

11 A. I don't think so. I don't know. I don't
12 recall. I don't even -- I remember, I mean, I'd
13 forgotten completely about that, about that
14 physician. But I doubt that I did, but I don't
15 know.

16 Q. You did make copies of the 60 Minutes
17 program and take it to your doctors; correct? That
18 is, the tape, you tape recorded that program?

19 A. No. I didn't. I didn't make copies of
20 it. I bought a copy of it from the 60 Minutes or
21 whatever, and I think I only gave it to one doctor.

22 Q. Is that Dr. McClellan?

23 A. I gave it to one. I never got it back so
24 I don't remember which one it was. So maybe it was